

Edward S. Kiel (019881991)

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COLE SCHOTZ P.C.

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Attorneys for Defendants Garth Andre Naar and Avatar Management LLC

EHP60N WAKEMAN LLC, EHP248O CENTER LLC, EHP120N IVY LLC, EHP242EO BURNETT LLC, ERIC HANTMAN, derivatively on behalf of EHP76B HECKEL LLC, EHP224N PARKER LLC, HHP256 NEPTUNE LLC, UHP461-HHP6600NB SMITH LLC, and PRIME NY INC., derivatively on behalf of EHP105N SCHOFIELD LLC, 475E CATHERINE LLC, EHP28-30 GREYLOCK LLC, and EPH312N SUMMER LLC,

Plaintiffs,

v.

GARTH ANDRE NAAR, AVATAR MANAGEMENT LLC, and SILVAN REAL ESTATE INCOME FUND, LP,

Defendants,

and

EHP76B HECKEL LLC, EHP224N PARKER LLC, HHP256 NEPTUNE LLC, UHP461-HHP6600NB SMITH LLC, 475E CATHERINE LLC, EHP28-30 GREYLOCK LLC, and EPH312N SUMMER LLC.

Nominal Defendants.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CIVIL ACTION NO. 2:18-cv-11047-KM-JBC

Civil Action

**NOTICE OF MOTION FOR LEAVE
TO WITHDRAW AS COUNSEL FOR
DEFENDANTS GARTH ANDRE
NAAR AND AVATAR
MANAGEMENT LLC**

TO: All Counsel of Record - via CM/ECF
Garth Andre Naar – via email and overnight mail
Avatar Management LLC – via email and overnight mail

PLEASE TAKE NOTICE that on December 3, 2018, or as soon thereafter as counsel may be heard, Cole Schotz P.C. (“Cole Schotz”), attorneys for defendants Garth Andre Naar and Avatar Management LLC (collectively, the “Avatar Parties”), shall move before the Honorable Kevin McNulty, U.S.D.J., of the United States District Court for the District of New Jersey, Newark Vicinage, located at the Martin Luther King Building & United States Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for the entry of an Order granting leave for Cole Schotz to withdraw as counsel for the Avatar Parties (the “Motion”).

PLEASE TAKE FUTHER NOTICE that the undersigned will rely upon the accompanying Declaration of Edward S. Kiel dated November 2, 2018 and Brief in Support of the Motion. A proposed form of Order has also been submitted.

PLEASE TAKE FURTHER NOTICE that the Court has directed that any opposition to the Motion be filed and served on all parties by November 9, 2018.

COLE SCHOTZ P.C.

*Attorneys for Defendants Gath Andre Naar
and Avatar Management LLC*

By: /s/ Edward S. Kiel
Edward S. Kiel
Eric S. Latzer
Elizabeth A. Carbone

Dated: November 2, 2018